

EXHIBIT E

CAUSE NO. 2024-34589

COAST TO COAST TITLE, LLC,	§	IN THE DISTRICT COURT OF
SOL CITY TITLE, LLC, MAGNOLIA	§	
TITLE ARKANSAS, LTD.,	§	
MAGNOLIA TITLE FLORIDA, LLC,	§	
THE PEABODY BULLDOG, LLC,	§	
AND JOHN MAGNESS	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
TYRELL L. GARTH, PHILLIP H.	§	
CLAYTON, DEBBIE MERRITT A/K/A	§	
DEBORAH MERRITT, MATTHEW	§	
D. HILL, CHARLES BURNS, P.	§	
GARRETT CLAYTON, SCOTT M.	§	
REEVES, ARIANE E. YOUNG,	§	
TINGLEMERRITT, LLP STARREX	§	
TITLE FLORIDA, LLC, LAURIE	§	
COOPER, MARKETSTREET	§	
CAPITAL PARTNERS, LLC,	§	
MARKETSTREET CAPITAL	§	
PARTNERS AR, LLC, AND BRIAN	§	
A. BREWER	§	11TH JUDICIAL DISTRICT

DEFENDANT LAURIE COOPER'S ORIGINAL ANSWER (SUBJECT TO SPECIAL APPEARANCE)

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant Laurie Cooper and, subject to her special appearance filed in this cause, files her Original Answer as follows:

I. GENERAL DENIAL

1. Defendant asserts a general denial as authorized by Texas Rule of Civil Procedure 92 and generally denies all the allegations contained in Plaintiffs' Original Petition. Defendant respectfully requests that Plaintiffs be required to prove the charges and allegations contained in their petition by a preponderance of the evidence where applicable, or higher burden of proof when required by law.

2. Defendant asserts the defenses of estoppel and waiver.
3. Defendant pleads the limitation on exemplary damages found in TEX. CIV. PRAC. & REM. CODE §§ 41.004, and 41.007-41.008, and the right to a bifurcated trial.
4. The filing of the answer subject to the special appearance does not waive the challenge to personal jurisdiction. TEX. R. CIV. P. 120a(1); *Dawson-Austin v. Austin*, 968 S.W.2d 319, 323 (Tex. 1998).
5. Defendant requests a trial by jury.

II. PRAYER

6. Defendant prays that this Court deny the relief sought by Plaintiffs and that Plaintiffs take nothing.

Respectfully submitted,

STILWELL, EARL & APOSTOLAKIS, LLP

By: /s/Steven C. Earl

Steven C. Earl

State Bar No. 24002028

James E. Graham

State Bar No. 24102973

128 Vision Park Blvd., Suite 140

Shenandoah, Texas 77384

Telephone: 281/419-6200

Telecopier: 281/419-0250

Steven@woodlandstxlawfirm.com

Jim@woodlandstxlawfirm.com

Attorneys for Laurie Cooper

CERTIFICATE OF SERVICE

This Original Answer was served in compliance with Rules 21 and 21a of the Texas Rules of Civil Procedure on the 24th day of July, 2024.

Simon W. Hendershot, III
Ian F. McNeil
Philip D. Racusin
Hendershot Cowart, P.C.
1800 Bering Drive, Suite 600
Houston, Texas 77057
(713) 783-3110
(713) 783-2809 (fax)
treyl@hchlauyerys.com
IMcNeil@hchlauyerys.com
pracusin@hchlauyerys.com
Attorneys for Plaintiffs

/s/James E. Graham

James E. Graham

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Heather Scott on behalf of James Graham

Bar No. 24102973

heather@meslawfirm.com

Envelope ID: 90134327

Filing Code Description: Answer/ Response / Waiver

Filing Description: Defendants Starrex Title Florida LLC Marketstreet

Capital Partners LLC Marketstreet Capital Partners AR LLC and Brian A

Brewer's First Amended Original Answer

Status as of 7/24/2024 1:47 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Steven CEarl		steven@woodlandstxlawfirm.com	7/24/2024 1:17:43 PM	SENT
Jim Graham		jim@woodlandstxlawfirm.com	7/24/2024 1:17:43 PM	SENT
Simon Hendershot	9417200	trey@hchlaxlawyers.com	7/24/2024 1:17:43 PM	SENT
HENDERSHOT COWART P.C.		netdocs@hchlaxlawyers.com	7/24/2024 1:17:43 PM	SENT
Elizabeth T.Garcia		egarcia@hchlaxlawyers.com	7/24/2024 1:17:43 PM	SENT
Philip D.Racusin		pracusin@hchlaxlawyers.com	7/24/2024 1:17:43 PM	SENT
Heather Scott		Heather@woodlandstxlawfirm.com	7/24/2024 1:17:43 PM	SENT